

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
GRANT GILCHRIST, III)	Case No. 21-31723-KLP
)	Chapter 7
Debtor)	

MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

COMES NOW, the Debtor, by counsel, and pursuant to 11 U.S.C. § 706, files the following Motion to Convert Case from Chapter 7 to Chapter 13, and in support hereof, states as follows:

1. The Debtor is currently a Debtor in a Chapter 7 case pending before this Court.
2. This case has not previously been converted under 11 U.S.C. § 1112, § 1208, or § 1307.

WHEREFORE, the Debtor hereby moves to convert this Chapter 7 case to a Chapter 13 case.

Respectfully submitted,

GRANT GILCHRIST, III
By Counsel

/s/ James E. Kane
James E. Kane (VSB# 30081)
KANE & PAPA, P.C.
P. O. Box 508
Richmond, Virginia 23218-0508
Telephone (804) 225-9500
Counsel for Debtor

CERTIFICATE OF SERVICE

I certify that on June 8, 2021, I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to the Debtor, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, all attorneys appearing in the previous case as listed below, and to all creditors and parties in interest on the attached matrix.

/s/ James E. Kane
Counsel for Debtor

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NOTICE OF MOTION

The Debtor has filed papers with the Court to convert this case to a Chapter 13 case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought, or if you want the court to consider your views on the motion, within twenty-one (21) days of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Main Street, Room 4100
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
P.O. Box 508
Richmond, Virginia 23218-0508

- Attend a hearing scheduled at a later date. You will receive a separate notice of hearing. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

GRANT GILCHRIST, III
By Counsel

/s/ James E. Kane
James E. Kane (VSB# 30081)
KANE & PAPA, P.C.
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/s/ James E. Kane
Counsel for Debtor